

Before the
POSTAL REGULATORY COMMISSION
WASHINGTON, DC 20268-0001

Strandquist Post Office
Strandquist, Minnesota

Docket No. A2012-95

PUBLIC REPRESENTATIVE COMMENTS
(February 6, 2012)

On December 2, 2011, Eunice Rud, on behalf of the Strandquist Residents (Petitioners), filed a petition with the Commission seeking review of the Postal Service's Final Determination to close the Strandquist, Minnesota post office (Strandquist post office).¹ After the closure delivery and retail services will be provided by rural route service through the Karlstad post office.² The Commission should affirm the Final Determination to close the Strandquist post office.

Participant pleadings. On January 26, 2012, Petitioners filed a participant statement supporting their Petition.³ The Postal Service filed its answering brief that same day.⁴ Petitioners express concerns about the effect on the community, effect on postal services, and economic savings. In its answering brief, the Postal Service addresses every concern raised by Petitioners.⁵

¹ Petition for Review Received from Strandquist Residents (Eunice Rud) Regarding Strandquist, MN Post Office 56758 (Petition).

² Final Determination to Close the Strandquist, MN Post Office and Extend Service by Rural Route Service (Final Determination) at 2.

³ Participant Statement Received from Eunice Rud, January 26, 2012 (Participant Statement). Petitioners explain that they did not file the participant statement by the deadline set forth in the procedural schedule because they did not receive the form until January 9, 2012. *Id.* at 2.

⁴ Answering Brief in Support of the Postal Service, January 26, 2012 (Answering Brief).

⁵ The Postal Service does not specifically address issues raised in the Participant Statement because it was filed contemporaneously with the Postal Service's answering brief. See Answering Brief at 1. The Participant Statement reiterates concerns expressed in the Petition and does not raise any new issues. Thus, the Postal Service adequately addresses all of Petitioners' concerns expressed in both the Petition and Participant Statement.

Petitioners' concerns. Petitioners argue that the Strandquist post office is a vital part of the community and its history. Petition; Participant Statement at 1. The Postal Service responds that it extensively considered the effect of the closing on the Strandquist community. Answering Brief at 10. It affirms that it will continue to provide regular and effective postal services to the Strandquist community. *Id.* It notes that the closing will not leave residents without a gathering place and information center because they may continue to meet informally, socialize, and share information at other businesses, churches, and residences in the community. *Id.* at 11.

Petitioners assert that many Strandquist customers would prefer traveling to the Newfolden post office for service rather than the Karlstad post office. Petition; Participant Statement at 1. The Postal Service responds that retail services and post office boxes are available at both post offices. Answering Brief at 9. The returned customer questionnaires also indicate that a number of Strandquist customers pass the Karlstad post office when shopping or traveling to and from work. See *generally* Administrative Record, Item No. 22.

Petitioners contend that the economic savings are inaccurate because they are based on the salary and benefits of the retired postmaster rather than the officer-in-charge currently operating the office. Petition; see Final Determination at 2. They submit that the economic savings should have also factored in costs with terminating the lease, which they contend will not expire for at least one more year. Petition. The Postal Service responds that using the postmaster's salary was appropriate because the postmaster position would have ultimately been filled if the Strandquist post office had not been closed. Answering Brief at 12. It asserts that the lease for the Strandquist post office expires on January 31, 2015, but includes a cancellation clause. *Id.*

The Administrative Record does not clearly state whether the lease has a 30-day cancellation clause. Compare Administrative Record, Item No. 15 with Item No. 18. However, even if the economic savings had included lease termination costs, the Postal Service would have adequately considered the economic savings resulting from the closure. See 39 U.S.C. § 404(d)(2)(A)(iv).

Conclusion. The Postal Service's Final Determination to close the Strandquist post office appears procedurally in order. The Public Representative concludes that no persuasive argument has been presented that would prevent the Commission affirming the Postal Service's Final Determination to close the Strandquist post office.

Respectfully submitted,

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